

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	THOMAS TAYLOR PEARCE	:	CHAPTER 13
	JENIFER MARIE PEARCE	:	
	Debtor	:	
		:	
	JACK N. ZAHAROPOULOS	:	
	STANDING CHAPTER 13 TRUSTEE	:	
	Movant	:	
		:	
	THOMAS TAYLOR PEARCE	:	CASE NO. 1-24-bk-02059
	JENIFER MARIE PEARCE	:	
	Respondent	:	

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 12th day of November 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Failure to properly state the liquidation value in Section 1B of the Plan. More specifically, the IRS Claim 4-1 was not provided for.
2. The Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
 - a. The Plan fails to provide that the sale or refinance of Debtor(s) real estate will occur within six (6) months.
 - b. Plan ambiguous as to its Base Amount. It is not clear what sale proceeds are dedicated to the Plan.

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 12th day of November 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

GARY J. IMBLUM, ESQUIRE
4615 DERRY STREET
HARRISBURG, PA 17111-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee